

**Please Date Stamp & Return
To Holland & Knight LLP**

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In re Applications of)	MM Docket No. 99-153
)	
READING BROADCASTING, INC.)	File No. BRCT-940407KF
)	
For Renewal of License of Station)	
WTVE(TV), Channel 51)	
Reading, Pennsylvania)	
)	
and)	
)	
ADAMS COMMUNICATIONS)	File No. BPCT-940630KG
CORPORATION)	
)	
For Construction Permit for a)	
New Television Station On)	
Channel 51, Reading, Pennsylvania)	

RECEIVED
APR 3 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Administrative Law Judge Richard L. Sippel

**READING BROADCASTING, INC.'S FIRST INTERROGATORIES
DIRECTED TO ADAMS COMMUNICATIONS CORPORATION**

Reading Broadcasting, Inc., by its counsel, pursuant to Sections 1.311 and 1.323 of the Commission's Rules, request that Adams Communications Corporation answer, in writing under oath or affirmation, these Interrogatories in accordance with the following instructions and definitions. Counsel for the Enforcement Bureau of the Federal Communications Commission advises Reading Broadcasting, Inc. that it concurs in propounding these Interrogatories.

INSTRUCTIONS

A. The singular form of a noun or a pronoun includes within its meaning the plural form of the noun or pronoun so used, and vice versa; the use of the feminine form of a pronoun includes within its meaning the masculine form of the pronoun so used, and vice versa; and the use of any tense of any verb includes within its meaning all other tenses of the verb so used.

B. These Interrogatories are of a continuing nature and you are required to serve supplemental responses if you obtain or become aware of additional or different information after the date of your initial response.

C. As used herein, the words "and" and "or" shall not be interpreted to exclude any information otherwise within the scope of any Interrogatory.

D. For any information you withhold because of a claim of privilege or other protection, state the nature of the information withheld and identify the precise privilege or protection claimed with sufficient specificity to permit a full determination of the validity of the claim.

DEFINITIONS

Unless negated by the context of the specific Interrogatory, the following definitions shall apply:

1. The words "you", "your", and "Adams" refer to Adams Communications Corporation to whom these Interrogatories are addressed, including, but not limited to, the officers, employees, servants, agents (including but not limited to current or

former attorneys, engineers and realtors), representatives, and assigns of Adams, whether before or after the incorporation of Adams.

2. As used herein, the term "document" means any written, recorded, photographic, graphic or other tangible matter, however produced or reproduced, and includes all electronically stored data accessible through computer or other information retrieval systems or devices. The term "document" includes the complete original document, all drafts, whether or not they resulted in a final document, and all non-identical copies thereof (including copies which by reason of subsequent modification of the copy by the addition of notations or other modifications, are no longer identical.) Documents covered by this discovery request include, but are not limited to: letters; memoranda; reports; contracts and other agreements; invoices; receipts; records of account; ledgers; spreadsheets; studies; plans; notebook entries; calendars and diaries; minutes, records, and transcripts of conferences, meetings, telephone calls, or other communications; publications and unpublished speeches and articles; typed and handwritten notes; electronic mail; facsimiles (including the header showing the receipt date and time); telegrams; telexes; tabulations; diagrams, graphs, charts, blueprints, and other drawings; technical plans and specifications; advertising, product labels, and packaging materials; photographs, slides, microfilm, microfiche, and other copies or reproductions; film, audio and video tapes; tape, disk, or other electronic or magnetic recordings; and computer printouts.

4. When an Interrogatory asks that you "identify": with respect to natural persons, provide the person's name, home and business addresses, phone numbers, and electronic mail address(es); and with respect to other than natural persons, the full name, address, and phone number of the entity.

5. As used herein, the term "person" or "persons" means all entities of every description and includes any natural person, corporation, partnership, association, company, estate, business or governmental entity or agency (public or private) having a separate identification, recognized in law or in fact.

6. As used herein, the terms "consulted" or "contacted" shall be deemed to include any form of communication (e.g., oral statements, descriptive actions, conversations, telephonic or other mechanical or electronic communications or any other type of communication including written letters or documents).

7. As used herein, the term "communication" or "communications" means without limitation, the transmission of a word, statement, fact, thing, idea, document (as defined above), instruction, demand or question and any responses thereto.

8. As used herein, the term "concerns or relates to" means, in whole or in part, addressing, analyzing, constituting, containing, commenting on, discussing, describing, identifying, referring to, reflecting, reporting on, stating, dealing with, or in any way pertaining to.

9. As used herein, "WTVE" refers to Station WTVE(TV), Channel 51, Reading, Pennsylvania.

INTERROGATORIES

Regarding Potential Markets:

1. Describe with particularity everything you did prior to filing your application in this matter to research potential markets for potential construction permit applications in competition with license renewal applications for television stations broadcasting "home shopping" programming, including the identity of each research source used and the information obtained from each research source.

2. With respect to each and every undertaking described in response to the foregoing Interrogatory:

- a. Give the date of the undertaking;
- b. Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
- c. State the itemized costs and expenses;
- d. Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;
- e. Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

Regarding the Community:

3. Describe with particularity everything you did prior to filing your application in this matter to determine the public interest and needs of the Reading, Pennsylvania, community.

4. With respect to each and every undertaking described in response to the foregoing Interrogatory:

- a. Give the date of the undertaking;
- b. Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
- c. State the itemized costs and expenses;
- d. Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;
- e. Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

Regarding WTVE's Programming:

5. Except as described in response to Interrogatories 10 - 16, below, describe with particularity everything you did prior to filing your application in this

matter to determine whether WTVE's programming addressed the public interest and needs of the Reading, Pennsylvania community.

6. With respect to each and every undertaking described in response to the foregoing Interrogatory:

- a. Give the date of the undertaking;
- b. Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
- c. State the itemized costs and expenses;
- d. Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;
- e. Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

7. Except as described in response to Interrogatories 10-16, below, describe with particularity everything you did prior to filing your application in this matter to review and analyze WTVE's programming.

8. With respect to each and every undertaking described in response to the foregoing Interrogatory:

- a. Give the date of the undertaking;
- b. Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
- c. State the itemized cost and expense;

d. Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;

e. Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

9. State with particularity every fact upon which you rely for, or which you contend supports, your conclusion prior to filing your application in this matter that WTVE's programming was not addressing the public interest and needs of the Reading, Pennsylvania community.

Regarding the Videotapes:

10. With respect to the videotape recordings of WTVE's programming that you commissioned prior to filing your application in this matter:

a. Give the dates that the recordings were made;

b. Identify everyone who was involved in and/or responsible for making the recordings and summarize their qualifications therefor;

c. State the itemized costs and expenses therefor;

d. State where the videotaping was done;

e. Identify every communication to which you were a party and which concerned or related to the videotapes and/or the videotaping and for each communication summarize its substance;

f. Identify every document in your possession, custody, or control, which concerns or relates to the videotapes and/or the videotaping.

11. Describe with particularity your review of the videotapes, including the manner of the review, the equipment used for the review, and the number of hours and identification on the tapes of programming reviewed.

12. With respect to your review of the videotape recordings of WTVE's programming described in response to the foregoing Interrogatory:

- a. Give the dates of the review;
- b. Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
- c. State the itemized costs and expenses therefor;
- d. Identify every communication to which you were a party and which concerned or related to the review of the videotapes and for each communication summarize its substance;
- e. Identify every document in your possession, custody, or control, which concerns or relates to the review of the videotapes.

13. Describe with particularity everything you did to compare the videotapes you were provided against WTVE's actual programming.

14. With respect to each and every undertaking described in response to the foregoing Interrogatory:

- a. Give the date of the undertaking;
- b. Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
- c. State the itemized costs and expenses therefor;

d. Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;

e. Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

15. State how you became aware that the videotapes which purported to be of WTVE's programming were not recordings of WTVE's programming.

16. State with particularity every fact upon which you rely for, or which you contend supports, your conclusion that the programming recorded on the videotapes which you were provided was substantially the same as WTVE's actual programming.

Regarding "Home Shopping" Programming:

17. Describe with particularity everything you did prior to filing your application in this matter to determine the public interest value of "home shopping" programming.

18. With respect to each and every undertaking described in response to the foregoing Interrogatory:

a. Give the date of the undertaking;

b. Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;

c. State the itemized costs and expenses;

d. Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;

e. Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

19. State precisely why you believe that "home shopping" programming is not in the public interest.

20. Describe with particularity everything that you have done to challenge, contest, oppose, or otherwise object to "home shopping" programming.

21. With respect to each and every undertaking described in response to the foregoing Interrogatory:

a. Give the date of the undertaking;

b. Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;

c. State the itemized costs and expenses therefor;

d. Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;

e. Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

Regarding Preparation of the Reading Application:

22. Describe with particularity everything you did prior to filing your application in this matter to prepare your application (including, but not limited to, efforts to locate sources of potential programming, financing, studio sites and transmitter sites) for the Reading, Pennsylvania construction permit.

23. With respect to each and every undertaking described in response to the foregoing Interrogatory:

- a. Give the date of the undertaking;
- b. Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
- c. State the itemized costs and expenses;
- d. Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;
- e. Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

24. Describe with particularity everything you did prior to filing your application in this matter to analyze the potential income and expenses of the potential television station in Reading, Pennsylvania, the market value of WTVE, and/or the market value of the potential television station or construction permit in Reading, Pennsylvania.

25. With respect to each and every undertaking described in response to the foregoing Interrogatory:

- a. Give the date of the undertaking;
- b. Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
- c. State the itemized costs and expenses;
- d. Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;
- e. Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

26. When did you decide to file your construction permit application for Channel 51, Reading, Pennsylvania?

27. With respect to such decision described in the foregoing Interrogatory:

- a. Identify every communication to which you were a party and which concerned such decision and for each communication summarize its substance;
- b. Identify every document in your possession, custody, or control which concerns, relates to or memorializes such decision.

Regarding Potential Settlement:

28. Describe with particularity all communications with other parties after filing your application in this matter concerning a potential settlement of the

matter or the value or potential value of WTVE or the proposed television station or construction permit in Reading, Pennsylvania.

Respectfully submitted,

READING BROADCASTING, INC.

By: Thomas J. Hutton
Thomas J. Hutton
C. Dennis Southard IV
Its Attorneys

Holland & Knight LLP
2100 Pennsylvania Ave., NW
Suite 400
Washington, DC 20037-3202
(202) 955-3000

April 3, 2000

CERTIFICATE OF SERVICE

I, Myra F. Powe, an employee of the law firm of Holland & Knight LLP, do hereby certify that on April 3, 2000, I caused a copy of the foregoing Reading Broadcasting, Inc.'s Interrogatories Directed To Adams Communications Corporation to be hand delivered as follows:

The Honorable Richard L. Sippel
Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W., Room 1-C864
Washington, D.C. 20554

James Shook, Esq.
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A463
Washington, D.C. 20554

Gene A. Bechtel, Esq.
Henry F. Cole, Esq.
Bechtel & Cole, Chartered
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(Counsel for Adams Communications Corporation)



Myra F. Powe

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HARRY F. COLE

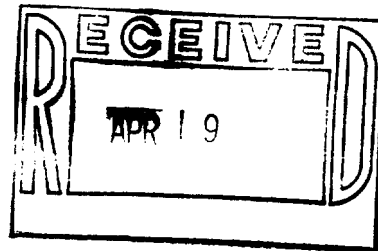
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April 19, 2000

HAND DELIVERED

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Suite 200
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James Shook, Esquire
Enforcement Bureau
Federal Communications Commission
445 12th Street, N.W. - Room 3-A463
Washington, D.C. 20554



Re: Reading Broadcasting, Inc., MM Docket No. 99-153

Dear Tom and Jim:

Transmitted to each of you with this letter on behalf of Adams Communications Corporation ("Adams") are documents which are responsive to your joint request for production of documents in the Reading proceeding. These documents are produced subject to the following:

Request No. 1

Adams has not responded to this request simply because Adams does not understand it as worded.

Request No. 2

Adams objects to this request as beyond the scope of the issue and beyond the permissible bounds of discovery. Adams also notes that the scope of the request (which refers to "prepar[ing] a potential application") is not at all clear. To the extent that this request seeks evidence that Adams did initiate the preparation of an application for a new construction permit for a television station in Marlborough, Massachusetts -- a fact which has been the subject of testimony already -- Adams is providing herewith non-privileged representative documents demonstrating that fact.

Request Nos. 6 and 10

Adams believes that all documents previously produced by Reading Broadcasting, Inc. ("RBI") concerning the programming of Station WTVE(TV) during the 1989-1994 license term are responsive

BECHTEL & COLE
CHARTERED

Thomas J. Hutton, Esquire
James Shook, Esquire
April 19, 2000
Page Two

to these requests as worded. Since those documents are already in the possession of RBI, Adams is not including additional copies herewith.

Request No. 13

Adams objects to this request as beyond the scope of the issue and beyond the permissible bounds of discovery.

Please note that I have redacted the account number information from the checks which are included in these materials, but have left the dates and amounts.

Additionally, as I have previously advised you, the videotapes recorded at Mr. Gilbert's request in June, 1994 are being copied and the copies will be delivered to Tom upon completion. The last word we heard from Graffiti indicated that the copying process would be completed this week.

Please let me know if you have any questions about any of the foregoing.

Sincerely,



Harry F. Cole

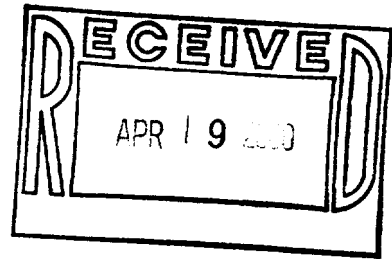
Counsel for Adams Communications
Corporation

cc: The Honorable Richard L. Sippel (by telecopy - 418-0195)
(w/o enc.)

COPY

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re Applications of)	MM Docket No. 99-153
)	
READING BROADCASTING, INC.)	File No. BRCT-940407KF
)	
For Renewal of License of)	
Station WTVE(TV), Channel 51)	
Reading, Pennsylvania)	
)	
and)	
)	
ADAMS COMMUNICATIONS CORPORATION)	File No. BPCT-940630KG
)	
For Construction Permit for a New)	
Television Station to Operate on)	
Channel 51, Reading, Pennsylvania)	
)	
To: Magalie Roman Salas, Secretary		
for direction to		
The Honorable Richard L. Sippel		
Administrative Law Judge		



ANSWERS AND OBJECTIONS OF ADAMS COMMUNICATIONS CORPORATION
TO READING BROADCASTING, INC.'S FIRST INTERROGATORIES

Adams Communications Corporation ("Adams") hereby submits its Answers and Objections to the "First Interrogatories" ("Interrogatories") directed to Adams by Reading Broadcasting, Inc. ("RBI"). The numbering of the paragraphs below corresponds to the numbering of the paragraphs in the Interrogatories.

1. Describe with particularity everything you did prior to filing your application in this matter to research potential markets for potential construction permit applications in competition with license renewal applications for television stations broadcasting "home shopping" programming, including the identity of each research source used and the information obtained from each research source.

Answer to Interrogatory No. 1

Adams understands that, when this Interrogatory refers to "research [of] potential markets for potential construction permit applications in competition with license renewal applications for television stations broadcasting 'home shopping' programming", it means "identify the communities of license of television stations broadcasting 'home shopping' programming and the dates on which the next license renewal applications for those stations were due to be filed". Howard N. Gilbert requested the law firm of Bechtel & Cole, Chartered ("B&C") to provide him with a list of television stations broadcasting home shopping programming. In response, B&C provided him that information.

2. With respect to each and every undertaking described in response to the foregoing Interrogatory:
 - (a) Give the date of the undertaking;
 - (b) Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
 - (c) State the itemized costs and expenses;
 - (d) Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;
 - (e) Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

Answer to Interrogatory No. 2

Mr. Gilbert spoke with one or more persons at B&C, concerning obtaining a list of television stations broadcasting "home shopping" programming. Mr. Gilbert requested that B&C provide him with such a list. Mr. Gilbert does not have any specific recollection of the date(s) on which such conversation(s) occurred. By letter dated July 16, 1993, Harry F. Cole sent Mr. Gilbert a list of full-service television stations licensed to the Home Shopping Network. By facsimile dated August 12, 1993, Mr. Cole sent a second such list to Mr. Gilbert. Internal B&C memoranda dated November 5 and 8, 1993 indicate that research into the identity of stations broadcasting "home shopping" programming was undertaken by B&C at approximately the date of those memoranda. Mr. Gilbert may have spoken with one or more persons at B&C concerning such research. Mr. Gilbert does not recall, and has no records concerning, the costs or expenses associated with these undertakings.

3. Describe with particularity everything you did prior to filing your application in this matter to determine the public interest and needs of the Reading, Pennsylvania, community.

Answer to Interrogatory No. 3

Mr. Gilbert visited Reading and the Reading area on a number of occasions during the period March-June, 1994. During those visits Mr. Gilbert, relying on experience he had obtained in previous business transactions, spoke with numerous individuals in the area concerning the needs and interests of the area and

reviewed available print materials concerning Reading and its surrounding area. Other Adams principals (possibly Robert Haag or Wayne Fickinger) may also have reviewed information and/or spoken with Mr. Gilbert concerning the Reading area.

4. With respect to each and every undertaking described in response to the foregoing Interrogatory:
 - (a) Give the date of the undertaking;
 - (b) Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
 - (c) State the itemized costs and expenses;
 - (d) Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;
 - (e) Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

Answer to Interrogatory No. 4

Mr. Gilbert visited the Reading area a number of times during the period March-June, 1994. The total costs of Mr. Gilbert's visits amounted to approximately approximately \$7,600. Mr. Gilbert is an experienced businessperson who has been personally involved in the acquisition of businesses in geographical areas and markets with which he was previously unfamiliar; he is also an experienced attorney and civic leader. In connection with his personal and professional activities, Mr. Gilbert has obtained experience in familiarizing himself with economic and sociological facts through the use of informal interviews. Mr. Gilbert learned this technique primarily from Mr. Haag over the course of several transactions in which Mr. Gilbert and Mr. Haag were both principals; Mr. Haag is also

an experienced businessperson with extensive familiarity with research of markets. Mr. Gilbert has no specific recollection of the identities of any of the persons in Reading (or the Reading area) with whom he spoke during his visits because he did not ask them their names. The interviews took place at a number of business establishments (including, but not limited to, retail malls and restaurants), as well as at the offices of the Reading Eagle. Mr. Gilbert believes that he may have spoken about his interviews with Messrs. Haag and/or Fickinger.

5. Except as described in response to Interrogatories 10-16, below, describe with particularity everything you did prior to filing your application in this matter to determine whether WTVE's programming addressed the public interest and needs of the Reading, Pennsylvania community.

Answer to Interrogatory No. 5

During the informal interviews conducted during his visits (described in the Answer to Interrogatories 3 and 4, above), Mr. Gilbert sought and obtained insight into the extent to which Station WTVE(TV) served the public interest and needs of the Reading community. Mr. Gilbert also monitored programming on a number of "home shopping" television stations to determine the nature of the programming provided by such stations. In April, 1994, Mr. Cole sent a copy of the 1994 license renewal application for Station WTVE(TV) to Mr. Gilbert and Garrison Cavell (Adams's consulting engineer). As set forth in response to Interrogatories 10-16, Mr. Gilbert also sought to have the programming of Station WTVE(TV) recorded, first for one 24-hour

period (on June 1, 1994), then for a portion of two consecutive days (on June 13-14, 1994), and then for a period of approximately two weeks, 24-hours per day, in order to provide him with a record of the nature of the station's programming.

6. With respect to each and every undertaking described in response to the foregoing Interrogatory:
 - (a) Give the date of the undertaking;
 - (b) Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
 - (c) State the itemized costs and expenses;
 - (d) Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;
 - (e) Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

Answer to Interrogatory No. 6

See Answer to Interrogatory No. 4.

7. Except as described in response to Interrogatories 10-16, below, describe with particularity everything you did prior to filing your application in this matter to review and analyze WTVE's programming.

Answer to Interrogatory No. 7

As described above, Mr. Gilbert interviewed multiple persons in Reading and the Reading area prior to the filing of the Adams application. During those interviews Mr. Gilbert sought information about the programming of Station WTVE(TV). Mr. Gilbert also monitored programming on a number of "home shopping" television stations in other markets to determine the nature of the programming provided by such stations. Also, as set forth in response to Interrogatories 10-16, Mr. Gilbert

sought to have the programming of Station WTVE(TV) recorded, first for one 24-hour period (on June 1, 1994), then for a portion of two consecutive days (on June 13-14, 1994), and then for a period of approximately two weeks, 24-hours per day, in order to provide him with a record of the nature of the station's programming.

8. With respect to each and every undertaking described in response to the foregoing Interrogatory:
- (a) Give the date of the undertaking;
 - (b) Identify everyone who was involved therein and/or responsible therefor and summarize their qualifications therefor;
 - (c) State the itemized costs and expenses;
 - (d) Identify every communication to which you were a party and which concerned or related to one or more of these undertakings and for each communication summarize its substance;
 - (e) Identify every document in your possession, custody, or control, which concerns or relates to one or more of these undertakings.

Answer to Interrogatory No. 8

See Answer to Interrogatory No. 4.

9. State with particularity every fact upon which you rely for, or which you contend supports, your conclusion prior to filing your application in this matter that WTVE's programming was not addressing the public interest and needs of the Reading, Pennsylvania community.

Answer to Interrogatory No. 9

Mr. Gilbert and other Adams principals had, prior to the filing of the Adams application, reviewed "home shopping" television programming in a number of markets, Mr. Gilbert had reviewed materials available in the files of the Federal Communications Commission concerning such programming, and Adams

principals were generally familiar with the nature and content of that programming. Such review indicated that the overwhelming majority of that programming consisted of attempts to sell merchandise to the audience; such review also indicated that "home shopping" programming contained virtually no substantial discussion of news or public affairs matters.

During his visits to Reading and the Reading area, Mr. Gilbert asked numerous persons about Station WTVE(TV)'s programming and the station's relationship with the community in general. None of the persons interviewed by Mr. Gilbert -- including a representative of the Reading Eagle -- was familiar with the station or with any locally-oriented programming on that station.

To observe first-hand the programming of Station WTVE(TV) in order to confirm the conclusions he had tentatively reached during his visits to Reading and the Reading area, Mr. Gilbert sought to make arrangements to have the station's programming taped, first for one 24-hour period (on June 1, 1994), then for a portion of two consecutive days (on June 13-14, 1994), and then for a period of 24-hours-per-day, seven-days-per-week, for approximately two weeks prior to the filing of the Adams application. Also prior to the filing of the Adams application, Mr. Gilbert reviewed most of the tapes so produced and concluded from that review that the programming contained therein did not include substantial or significant discussion of news or public affairs matters, and particularly locally-oriented news or public affairs matters.